

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)(KMW)

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CERTIFICATION OF DAVID J. STANOCH IN SUPPORT OF *DAUBERT*  
MOTION TO EXCLUDE CLASS CERTIFICATION OPINIONS OF  
WILLIAM J. LAMBERT

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I, David J. Stanoch, certify as follows:

1. My name is David J. Stanoch. I am an attorney at law with the law firm of Kanner & Whiteley, L.L.C., and serve as Court-appointed Plaintiffs' Liaison Counsel to the Plaintiffs' Side. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' Motion to Exclude Testimony of William J. Lambert, Ph.D.
2. Attached hereto as **Exhibit 1** to the Motion is a true and correct copy of Dr. Lambert's January 12, 2022 expert report.
3. Attached hereto as **Exhibit 2** to the Motion is a true and correct copy of the transcript of Dr. Lambert's March 8, 2022 deposition.
4. Attached hereto as **Exhibit 3** is a true and correct excerpt of the March 2, 2022 hearing transcript in this matter.

5. Attached hereto as **Exhibit 4** to the Motion is a true and correct excerpt of the transcript of Blessy Johns' April 15, 2021 deposition.
6. Attached hereto as **Exhibit 5** to the Motion is a true and correct excerpt of the transcript of Dr. Ambati Rama Mohana Rao's April 30, 2021 deposition.

Executed this   3rd   day of May, 2022.

/s/ David J. Stanoch  
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